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*Attorneys for Individual and Representative Plaintiffs
Cung Le, Nathan Quarry, and Jon Fitch, Bradon Vera, Luis
Javier Vazquez, and Kyle Kingsbury*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

**Cung Le, Nathan Quarry, and Jon Fitch,
Bradon Vera, Luis Javier Vazquez, and Kyle
Kingsbury, on behalf of themselves and all
others similarly situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF KEVIN E. RAYHILL
IN SUPPORT OF PLAINTIFFS'
EMERGENCY MOTION FOR A LETTER
OF REQUEST FOR DOCUMENTS FROM
GROUP ONE HOLDINGS PTE. LTD.**

1 I, Kevin E. Rayhill, declare and state as follows:

2 1. I am an attorney at the Joseph Saveri Law Firm, Inc., Co-Lead Counsel for the Classes
3 and Attorneys for Individual and Representative Plaintiffs. I am a member in good standing of the State
4 Bar of California, and have been admitted *pro hac vice* in this Court. I am over 18 years of age and have
5 personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would
6 testify competently to them.

7 2. I make this declaration in support of Plaintiffs' motion for a letter of request addressed to
8 Group One Holdings Pte. Ltd ("One Championship").

9 3. On June 1, the Court extended the discovery period until July 31, 2017, and approved
10 new discovery to be issued to One Championship. Plaintiffs are filing this motion as an emergency
11 motion in order to facilitate production of the requested documents before the close of fact discovery.

12 4. On June 7, I spoke with Christopher Morley, counsel for One Championship Vice
13 President Matt Hume, a resident of Washington State. Mr. Morley is an attorney at Davis Wright
14 Tremaine LLP, Suite 2200, 1201 Third Avenue, Seattle, Washington 98101-3045, (206) 757-8084,
15 chrismorley@dwt.com. I asked Mr. Morley if he would accept service on behalf of One Championship
16 c/o Mr. Hume. Mr. Morley informed me that he would not accept service on behalf of One
17 Championship because it is a foreign corporation that is not subject to the jurisdiction of United States
18 courts. Mr. Morley indicated that One Championship might be willing to produce some documents
19 voluntarily, but would not produce any confidential business information.

20 5. On June 20 I spoke with Mr. Morley again to confirm whether One Championship would
21 be willing to voluntarily produce the quarterly financial information sought in the letter of request. Mr.
22 Morley responded that One Championship would not voluntarily produce these documents.

23 6. On June 20, I exchanged emails with Stacey Grigsby, counsel for defendant Zuffa, LLC
24 ("Zuffa"). Ms. Grigsby is an attorney at Boies Schiller Flexner LLP, 1401 New York Ave, NW,
25 Washington, DC 20005, (202) 237-9619, sgrigsby@bsflp.com. I asked Ms. Grigsby if Zuffa would
26 oppose Plaintiffs motion for a letter of request, and if Zuffa would agree to an abbreviated briefing
27 schedule. Ms. Grigsby informed me that Zuffa takes no position regarding the motion and will not be
28 filing a response to Plaintiffs' motion. Accordingly, Plaintiffs' motion and related documents will be the

1 only filing relating to the emergency motion. Attached hereto as Exhibit 1 is a true and correct copy of my
2 email exchange with Ms. Grigsby.

3 7. Attached hereto as Exhibit 2 is a placeholder for a document produced by One
4 Championship to Zuffa, who in turn produced it to Plaintiffs with the instruction that it was to be
5 treated as Highly Confidential – Attorneys’ Eyes Only. The document has the Bates number
6 ONECHAMPIONSHIP000006. A true and correct copy of this document will be filed under seal
7 with the Court.

8 8. Attached hereto as Exhibit 3 is a true and correct copy of an email sent from Chris
9 Morley to Kevin Rayhill on June 13, 2017.

10 9. Attached hereto as Exhibit 4 is a true and correct copy of the Convention on the Taking
11 of Evidence Abroad in Civil or Commercial Matters, downloaded at my direction from the Hague
12 Convention’s website on June 15, 2017, and available for download at
13 <https://www.hcch.net/en/instruments/conventions/full-text/?cid=82>.

14 10. Attached hereto as Exhibit 5 is a true and correct copy of a document entitled Details –
15 Singapore – Central Authority (Art. 2) and practical information, downloaded at my direction from the
16 Hague Convention’s website on June 15, 2017, and available for download at
17 <https://www.hcch.net/en/states/authorities/details3/?aid=532>.

18 11. Attached hereto as exhibit 6 is a true and correct copy of a document entitled
19 Declaration/Reservation/Notification, downloaded at my direction from the Hague Convention’s
20 website on June 15, 2017, and available for download at
21 <https://www.hcch.net/en/instruments/conventions/status-table/notifications/?csid=569&disp=resdn>.

22 12. Attached hereto as Exhibit 7 is a placeholder for an excerpt from a document produced to
23 Plaintiffs by Zuffa with the Bates number ZFL-1471125. Zuffa has designated this document as
24 Confidential. A true and correct copy of this document will be filed under seal with the Court.

25 13. Attached hereto as Exhibit 8 is a placeholder for an excerpt from the Deposition
26 Transcript for Lorenzo Fertitta, who was deposed by Plaintiffs on March 23, 2017. Zuffa has designated
27 portions of this transcript as Confidential. A true and correct copy of this document will be filed under
28 seal with the Court.

1 I declare under penalty of perjury and the laws of the United States that the foregoing is true and
2 correct and this Declaration is executed in San Francisco, California on June 20, 2017.

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4 By: /s/Kevin E. Rayhill
Kevin E. Rayhill
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